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10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

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13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

No. CR 2:24-621(B)-MWF

16 Plaintiff,

GOVERNMENT'S UNOPPOSED EX PARTE
APPLICATION FOR ORDER SEALING
DOCUMENTS; MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF DANIEL
H. WEINER

17 v.

18 DURK BANKS, et al.,

19 Defendants.

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23 Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys Ian V. Yanniello,
Gregory W. Staples, and Daniel H. Weiner, hereby applies ex parte for
an order directing that the government's unredacted Motion to Empanel
an Anonymous Jury, unredacted Declaration of Jarron Farmby, and

1 Exhibit B to the Farmby Declaration in the above-entitled case be
2 kept under seal until further order of the Court.

3 This ex parte application is based upon the attached memorandum
4 of points and authorities and Declaration of Daniel H. Weiner.
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6 Dated: October 6, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
8 Acting United States Attorney

9 JOSEPH T. MCNALLY
10 Assistant United States Attorney
Acting Chief, Criminal Division

11 /s/
12 IAN V. YANNIELLO
13 GREGORY W. STAPLES
14 DANIEL H. WEINER
Assistant United States Attorneys

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Plaintiff United States of America requests that this Court seal
3 the government's Motion to Empanel an Anonymous Jury, unredacted
4 Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration
5 in this case. The government has publicly filed redacted versions of
6 its Motion to Empanel an Anonymous Jury and Declaration of Jarron
7 Farmby to protect sensitive witness information and other sensitive
8 information.

9 The Court has inherent supervisory authority to seal documents
10 in appropriate circumstances. See Nixon v. Warner Communications, Inc.,
11 435 U.S. 589, 598 (1978) ("Every court has supervisory power
12 over its own records and files").

13 Here, for the reasons described in the attached declaration,
14 sealing of these documents is necessary to protect certain criminal
15 history records and the identity of witnesses who participated in the
16 government's investigation, who may testify at trial, and/or whose
17 safety or whose family's safety may be endangered by disclosure of
18 identifying information.

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The government accordingly requests that the documents described in the attached declaration be maintained under seal until further order of the Court.

Dated: October 6, 2025

Respectfully submitted,

BILAL A. ESSAYLI
Acting United States Attorney

JOSEPH T. McNALLY
Assistant United States Attorney
Acting Chief, Criminal Division

/s/
IAN V. YANNIELLO
GREGORY W. STAPLES
DANIEL H. WEINER
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF DANIEL H. WEINER

I, Daniel H. Weiner, declare as follows:

1. I am an Assistant United States Attorney for the Central District of California and I am one the attorneys assigned to the prosecution of United States v. Durk Banks, et al., No. CR 24-621(B)-MWF. I make this declaration in support of the government's unopposed ex parte application for an order sealing the government's unredacted Motion to Empanel an Anonymous Jury, unredacted Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration.

2. The government requests leave to file these documents under seal. The above-described documents discuss and/or contain certain sealed and/or expunged criminal history records, the criminal history records of non-charged individuals, and identifying information of witnesses who participated in the government's investigation, who may testify at trial, and/or whose safety or whose family's safety may be endangered by disclosure of identifying information. Sealing of these documents is therefore desirable to protect certain individual's privacy interests, and because the government believes that public disclosure of such information may endanger the witnesses and/or their family's safety, and could cause others to attempt to intimidate the witnesses and/or their family, or otherwise dissuade the witnesses from cooperating with the government.

3. Accordingly, the government requests that the government's unredacted Motion to Empanel an Anonymous Jury, unredacted Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration be kept under seal until further order of the Court.

1 4. Counsel for defendants advised the government during a
2 telephonic meet and confer on October 1, 2025 that they had no
3 objection to the government's request.

4 I declare under penalty of perjury under the laws of the United
5 States of America that the foregoing is true and correct to the best
6 of my knowledge and belief and that this declaration was executed on
7 October 6, 2025, at Los Angeles, California.

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11 /s/
12 DANIEL H. WEINER
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